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April 25, 2022

The Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East

Re: United States v. Full Play Group, S.A., Case No. 15-cr-252 (PKC)

Dear Judge Chen:

On behalf of Full Play Group, S.A., we respectfully submit the proposed questions for *voir dire* examination. Full Play joined in the proposed jury instructions submitted jointly by the defendants, and submit the following as a supplement to those instructions:

- Second paragraph under the section entitled “Fourth Element: Use of the Wires” should read:

It is not necessary that all or most of the wire communications involved in the alleged scheme to defraud were sent to, from, or within the United States. However, for the wire-use element to be satisfied, the scheme to defraud must make more than minimal use of wire communications that pass between two or more states or between the United States and a foreign country. There is no specific number of wires that defines minimal use, rather it is up to you to determine, based on the totality of the circumstances in this case, whether the government has proven beyond a reasonable doubt that there was more than a minimal use of interstate wires.

- Third paragraph under Section II.E.1., “Conspiracy Generally,” should read as follows:

The first element requires that the government prove that at least two conspirators had a meeting of the minds, and that they agreed to work together to accomplish the object of the charged conspiracy, which as charged in the Indictment is that the defendant agreed to pay, did pay and facilitated the concealment of annual bribe and kickback payments to

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certain high-ranking CONMEBOL officials in exchange for the officials' support of certain sports marketing entities as the holder of the rights to certain soccer tournaments.

- The first element of wire fraud conspiracy should read:

First: at least two conspirators had a meeting of the minds, and that they agreed to work together to accomplish the object of the charged conspiracy, which as charged in the Indictment is an agreement to pay, and facilitate the concealment of annual bribe and kickback payments to certain high-ranking CONMEBOL officials in exchange for the officials' support of sports marketing companies as the holder of the rights to certain soccer tournaments; and

We appreciate Your Honor's consideration of these matters.

Respectfully,

/s/ Carlos F. Ortiz

Carlos F. Ortiz
Partner